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November 1, 2013

Honorable Morris Stern, U.S.B.J.
United States Bankruptcy Court
District of New Jersey
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, NJ 07102

Re: In re Bergenfield Senior Housing, LLC; Case No. 13-19703-MS

Dear Judge Stern,

This firm represents the Debtor in the above case. At the hearing on October 24, 2013 to consider approval of the Debtor's disclosure statement, Your Honor required revisions be made to the proposed disclosure statement and ancillary documents prior to approval, and directed that we re-submit the revised pleadings for the Court's consideration, following review by counsel for Boiling Springs Savings Bank ("BSSB"), SM Global Group, LLC ("SM Global"), the Rotonda family and the office of the U.S. Trustee.

The revisions referenced above were made and revised pleadings were circulated to counsel. However, at about the same time, counsel for SM Global and the Rotonda family commenced settlement discussions. The Debtor is hopeful that, if such discussions are successful, a settlement can be reached among the Rotonda family, SM Global and the Debtor which can lay the groundwork for a consensual plan. (Discussions between counsel for the Debtor and BSSB will also take place during this period.)

Accordingly, the parties have agreed to a short "recess" of the disclosure statement approval process, to afford a meaningful opportunity continue the settlement discussions. The parties have agreed on a target date of November 21, 2013 to file a revised plan and disclosure statement. This gives the parties about two weeks for settlement discussions, and one further week so that a settlement can be documented and included in a further revised plan.

To accommodate this "recess," the dates requested for voting and plan objections, as well as for the confirmation hearing, need to be extended, to ensure adequate notice can be provided. The Debtor proposes an extended voting and objection deadline, to be

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established in the Disclosure Statement Approval Order, of January 7, 2014, and a confirmation hearing on January 14, 2014 at 10:30 a.m. These revised dates will be included in a proposed revised Disclosure Statement Approval Order and Confirmation Hearing Notice, which will be filed with the revised Plan and Disclosure Statement. This modified schedule for the confirmation process will also necessitate further extensions of the deadlines related to the Bid Procedures. The Debtor will provide notice of such extensions through a Certification of Counsel, similar to prior extensions.

Notice of the Debtor's request for approval of a disclosure statement was served on all parties in the case, though of course the actual proposed disclosure statement was not mailed, unless specifically requested, pursuant to Fed. R. Bankr. P. 3017. The Debtor will ensure that all parties that have requested service of any disclosure statement herein will be served when any revised plan or disclosure statement pleadings are circulated. To date, the only parties who have requested such drafts are BSSB, SM Global, the Rotonda family and the U.S. Trustee. Accordingly, the Debtor asserts that, so long as those parties approve of any further modifications to the proposed disclosure statement, no further notice or hearing should be required for the Court to approve same.

Please note that we are not requesting that Your Honor sign any Order at this time. Rather, all counsel wanted the Court to be informed of the status of the case, given that Your Honor had expected revised documents to be submitted punctually following the October 23 hearing.

The parties thank the Court for your understanding and patience as we seek to reach a consensual plan. Should Your Honor have any questions or concerns, please do not hesitate to have a member of chambers staff contact Mr. Kleban or me.

Very truly yours,

McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

/s/ Aaron S. Applebaum

AARON S. APPLEBAUM

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